

**Chollet, Nicki**

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**From:** Allen G. Reiter  
**Sent:** Thursday, September 29, 2016 1:13 PM  
**To:** Henn, Charlie  
**Cc:** Hooker, Charles; Chollet, Nicki; Michelle M. Marsh; Lindsay Korotkin; Alissa Friedman  
**Subject:** Motion to Compel

Charlie,

We will be making a supplemental document production next Thursday (and possibly earlier) on behalf of both TRB and the licensee defendants that we believe will complete our production in response to your outstanding document requests. We believe that this production will obviate many of the issues you have previously raised with our production.

To the extent that you have any remaining issues after your team has reviewed next week's production, we suggest scheduling a telephonic meet and confer. In contrast to the lengthy process we undertook before we filed our motion to compel, the parties have not had a proper meet and confer on the issues raised in Charles Hooker's email to the court, dated September 20. We believe that our supplemental production, coupled with a subsequent meet-and-confer, may resolve those issues in advance of the first licensee deposition, currently scheduled for October 14, without the need to involve the court.

Accordingly, we suggest that you do not file your planned cross-motion to compel until we complete this process, as it would be premature to do so.

**Allen G. Reiter**  
Partner

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